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6 Attorneys for Defendant  
COSTCO WHOLESALE CORPORATION

7  
8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10  
11 JAYASHREE SINGH,

12 Plaintiff,

13 vs.

14 COSTCO WHOLESALE CORPORATION,  
and DOES 1 TO 50,

15 Defendants.

No. 5:20-cv-08180-NC

**DECLARATION OF ERAN S. FORSTER  
IN SUPPORT OF DEFENDANT'S  
NOTICE OF MOTION AND MOTION  
FOR SUMMARY JUDGMENT**

**DATE: May 31, 2023  
TIME: 1:00pm**

**JUDGE NATHANAEL COUSINS**

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18 **DECLARATION OF ERAN S. FORSTER, ESQ.**

19 I, Eran S. Forster, Esq., declare and state as follows:

- 20 1. I am an associate of the Law Firm Ford, Walker, Haggerty & Behar, LLP, attorneys of record  
21 for Defendant Costco Wholesale Corporation (hereinafter, "Costco").
- 22 2. I have substantial responsibility for this case and have reviewed the file in this matter. I have  
23 personal knowledge of the following and, if sworn as a witness, could and would competently testify  
24 thereto, under oath.
- 25 3. Attached in support of Costco's Motion for Summary Judgment are true and correct copies of  
26 Declarations of Jonathan Eric von Delden, an Assistant General Manager at Costco; and Jorge Molina,  
27 a Front-End Manager at Costco.

1 4. Attached as **Exhibit “A”** is a Transcript from the Deposition of Plaintiff Jayashree Singh that  
2 was held on September 29, 2022;

3 5. Attached as **Exhibit “B”** is the Declaration of Jorge Molina;

4 6. Attached as **Exhibit “C”** are Photographs taken from September 4, 2022, and authenticated by  
5 Jorge Molina in Exhibit B para. 8;

6 7. Attached as **Exhibit “D”** is a true and correct copy of the Video captured on September 4, 2022  
7 of the food court at Costco Food Court;

8 8. Attached as **Exhibit “E”** is the Declaration of Jonathan Eric von Delden;

9 9. Attached as **Exhibit “F”** are Screenshots of Video (Exhibit D) capturing the Safety Inspection;

10 10. Attached as **Exhibit “G”** are Costco’s Floor Walk and Safety Sheet dated September 4, 2022,  
11 and authenticated by Jonathan Eric von Delden in Exhibit E para. 7;

12 11. Attached as **Exhibit “H”** are Screenshots of Video (Exhibit D) capturing Jorge Molina;

13 12. Attached as **Exhibit “I”** are Screenshots of Video (Exhibit D) capturing Costco customer, soda  
14 and shopping cart;

15 13. Attached as **Exhibit “J”** are Screenshots of Video (Exhibit D) capturing Costco customer and  
16 soda;

17 14. Attached as **Exhibit “K”** are Screenshots of Video (Exhibit D) capturing plaintiff’s slip and fall.

18 Dated: April 21, 2023

FORD, WALKER, HAGGERTY & BEHAR, LLP

19  
20 By: /S/ Eran S. Forster

21 ARTHUR J. CASEY

22 ERAN S. FORSTER

Attorneys for Defendant

23 COSTCO WHOELSALE CORPORATION  
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